

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**GENOVA BURNS LLC**

Daniel M. Stolz, Esq.  
Donald W. Clarke, Esq.  
Gregory S. Kinoian, Esq.  
[dstolz@genovaburns.com](mailto:dstolz@genovaburns.com)  
[dclarke@genovaburns.com](mailto:dclarke@genovaburns.com)  
[gkinoian@genovaburns.com](mailto:gkinoian@genovaburns.com)  
110 Allen Road, Suite 304  
Basking Ridge, NJ 07920  
Tel: (973) 467-2700  
Fax: (973) 467-8126  
*Proposed Local Counsel for the Official  
Committee of Talc Claimants*

**BROWN RUDNICK LLP**

David J. Molton, Esq.  
Michael S. Winograd, Esq.  
Susan Sieger-Grimm, Esq.  
Kenneth J. Aulet, Esq.  
[dmolton@brownrudnick.com](mailto:dmolton@brownrudnick.com)  
[mwinograd@brownrudnick.com](mailto:mwinograd@brownrudnick.com)  
[ssieger-grimm@brownrudnick.com](mailto:ssieger-grimm@brownrudnick.com)  
[kaulet@brownrudnick.com](mailto:kaulet@brownrudnick.com)  
Seven Times Square  
New York, NY 10036  
Tel: (212) 209-4800  
Fax: (212) 209-4801  
And-  
Jeffrey L. Jonas, Esq.  
Sunni P. Beville, Esq.  
Eric R. Goodman, Esq.  
[jjonas@brownrudnick.com](mailto:jjonas@brownrudnick.com)  
[sbeville@brownrudnick.com](mailto:sbeville@brownrudnick.com)  
[egoodman@brownrudnick.com](mailto:egoodman@brownrudnick.com)  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
Fax: (617) 856-8201  
*Proposed Co-Counsel for the  
Official Committee of Talc Claimants*

**OTTERBOURG PC**

Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
Michael R. Maizel, Esq.  
[mcyganowski@otterbourg.com](mailto:mcyganowski@otterbourg.com)  
[jfeeney@otterbourg.com](mailto:jfeeney@otterbourg.com)  
[mmaizel@otterbourg.com](mailto:mmaizel@otterbourg.com)  
230 Park Avenue  
New York, NY 10169  
Tel: (212) 905-3628  
Fax: (212) 682-6104  
*Proposed Co-Counsel for the Official  
Committee of Talc Claimants*

**MASSEY & GAIL LLP**

Jonathan S. Massey, Esq.  
Rachel S. Morse, Esq.  
[jmassey@masseygail.com](mailto:jmassey@masseygail.com)  
[rmorse@masseygail.com](mailto:rmorse@masseygail.com)  
1000 Maine Ave. SW, Suite 450  
Washington, DC 20024  
Tel: (202) 652-4511  
Fax: (312) 379-0467  
*Proposed Co-Counsel for the Official  
Committee of Talc Claimants*

In re: LTL MANAGEMENT, LLC, <sup>1</sup>  Debtor.	Chapter 11  Case No.: 23-12825 (MBK)  Honorable Michael B. Kaplan
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**NOTICE OF MOTION FOR ENTRY OF PROTECTIVE ORDER**

**PLEASE TAKE NOTICE**, that *the date and time specified in the Order Shortening Notice*, the undersigned, as local bankruptcy counsel for the Official Committee of Talc Claimants (the “Committee”) of LTL Management LLC, (“LTL” or the “Debtor”), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of the order submitted with this motion, and for such other relief that is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing and filed consistent with the *Order Shortening Notice* with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Respectfully submitted,

**GENOVA BURNS, LLC**

*/s/Donald W. Clarke*

By: \_\_\_\_\_

Donald W. Clarke, Esq.  
Daniel M. Stolz, Esq.  
110 Allen Road, Suite 304  
Basking Ridge, NJ 07920  
Telephone: (973) 533-0777  
Facsimile: (973) 467-8126  
Email: [dstolz@genovaburns.com](mailto:dstolz@genovaburns.com)  
Email: [dclarke@genovaburns.com](mailto:dclarke@genovaburns.com)

*Local Counsel to the Official Committee  
of Talc Claimants of LTL Management, LLC*